

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BRIAN CROMBIE, Individually and Behalf of
All Others Similarly Situated,

Plaintiff,

v.

MOLSON COORS BREWING COMPANY,
PETER H. COORS, W. LEO KIELY III,
CHARLES M. HERINGTON, FRANKLIN W.
HOBBS, RANDALL OLIPHANT, PAMELA
PATSEY, WAYNE SANDERS, ALBERT C.
YATES, TIMOTHY V. WOLF, PETER
SWINBURN, DAVID G. BARNES and PETER
M. R. KENDALL,

Defendants.

Civil Action No. 06-167-KAJ

IN RE MOLSON COORS BREWING
COMPANY SECURITIES LITIGATION

Civil Action No. 05-294-KAJ
(CONSOLIDATED)

UNOPPOSED MOTION FOR CONSOLIDATION OF ACTIONS

Defendants Molson Coors Brewing Company, Peter H. Coors, W. Leo Kiely III, Charles M. Herington, Franklin W. Hobbs, Randall Oliphant, Pamela Patsley, Wayne Sanders, Albert C. Yates, Timothy V. Wolf, Peter Swinburn, David G. Barnes and Peter M.R. Kendall (collectively “Defendants”) hereby move the Court for an order consolidating the above-captioned actions. In support of their Motion, Defendants state as follows:

1. In May 2005, three plaintiffs filed purported class action complaints in the United States District Court for the District of Delaware alleging violations of federal securities law in connection with the merger between Adolph Coors Brewing Company and Molson, Inc.

2. In July 2005, plaintiff Crombie filed a lawsuit against the same defendants in the United States District Court for the District of Colorado (the “Colorado Action”) that also alleged violations of federal securities law in connection with the merger of Adolph Coors Company and Molson, Inc.

3. On November 7, 2005, this Court consolidated the three cases pending in the District of Delaware as *In re Molson Coors Brewing Company Securities Litigation*, C.A. No. 05-294-KAJ (Consolidated) (the “Consolidated Action”).

4. On March 1, 2006, the parties to the Colorado Action filed a joint motion to transfer venue in anticipation of consolidating the Colorado Action with the Consolidated Action. The parties agreed that, “upon transfer of [the Colorado Action] to the District of Delaware, [the parties] will seek consolidation with the Delaware consolidated securities class action and that the consolidated amended complaint recently filed in that action will serve as the sole operative complaint.”

5. On March 2, 2006, the District Court for the District of Colorado entered an order transferring the Colorado Action to this Court.

6. On March 13, 2006, the Clerk of this Court docketed the Colorado Action as *Crombie v. Molson Coors Brewing Company, et al.*, C.A. No. 06-167-KAJ (“C.A. No. 06-167”).

7. Counsel for Mr. Crombie and Lead Counsel in the Consolidated Action have informed counsel for Defendants that plaintiffs do not oppose the relief sought in this motion.

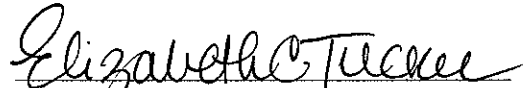
WHEREFORE, Defendants respectfully request that this Court enter an order in the form attached hereto consolidating C.A. No. 06-167 with Consol. C.A. No. 05-294-KAJ for all purposes, and declaring that the Consolidated Amended Class Action Complaint filed on

February 6, 2006, in Consol. C.A. No. 05-294-KAJ shall serve as the sole operative complaint for the consolidated action.

OF COUNSEL:

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Dated: April 6, 2006

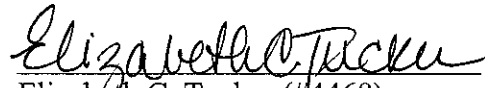


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Counsel for Defendants

CERTIFICATION PURSUANT TO DISTRICT OF DELAWARE RULE 7.1.1

Counsel for Defendants Molson Coors Brewing Company, Peter H. Coors, W. Leo Kiely III, Charles M. Herington, Franklin W. Hobbs, Randall Oliphant, Pamela Patsley, Wayne Sanders, Albert C. Yates, Timothy V. Wolf, Peter Swinburn, David G. Barnes and Peter M.R. Kendall consulted with counsel for plaintiff Brian Crombie and Lead Counsel in the Consolidated Action pursuant to District of Delaware Local Rule 7.1.1 and determined that plaintiffs are not opposed to the relief sought in the attached motion.


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BRIAN CROMBIE, Individually and Behalf of
All Others Similarly Situated,

Plaintiff,

v.

MOLSON COORS BREWING COMPANY,
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CHARLES M. HERINGTON, FRANKLIN W.
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M. R. KENDALL,

Defendants.

Civil Action No. 06-167-KAJ

IN RE MOLSON COORS BREWING
COMPANY SECURITIES LITIGATION

Civil Action No. 05-294-KAJ
(CONSOLIDATED)

ORDER

WHEREAS, the Court having considered Defendants' Unopposed Motion for Consolidation of Actions;

IT IS HEREBY ORDERED this ___ day of _____, 2006, that the Motion is GRANTED and that:

1. The above-referenced actions shall be consolidated for all purposes. Hereafter, all papers need only be filed in Consol. C.A. No. 05-294-KAJ.

2. The Consolidated Amended Class Action Complaint filed on February 6, 2006, in Consol. C.A. No. 05-294-KAJ shall serve as the sole operative complaint for the consolidated action.

3. The schedule currently in place for Consol. C.A. No. 05-294-KAJ shall not be altered as a result of the consolidation of these actions.

The Honorable Kent A. Jordan
United States District Judge

CERTIFICATE OF SERVICE

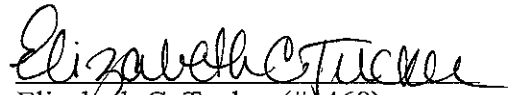
The undersigned hereby certifies that she caused copies of the foregoing Unopposed Motion for Consolidation of Actions and Proposed Order of Consolidation to be served upon the following counsel of record this 6th day of April, 2006:

BY CM/ECF:

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